

Nguyen, Tung

From: Montoya, Ramona <POI36871@isletapueblo.com>
Sent: Wednesday, January 10, 2018 12:16 PM
To: Nguyen, Tung
Cc: POI17501@isletapueblo.com; poi36873@isletapueblo.com; Larsen, Brent; Jaramillo, Francine
Subject: RE: Update on ABCWUA permit consideration

Good morning Tung

My apologies; I understand. I thought we had agreed by conference call that the limiting factor in using other than a zero flow rate in the ABCWUA Permit is the wording in the Pueblo's surface water quality standards (WQS): "Criteria specific to a designated use shall be protected at all times and at all flow rates (SECTION I. (H))."

The ABCWUA permit must be written to comply with the Pueblo's WQS. Still, the Pueblo is planning a triennial review in 2018 and the Pueblo would certainly entertain a revision to the WQS that does take into consideration EPA's analysis of the lowest flow rate over the past 20 years, which is more representative to actual physical condition immediately upstream of the WWTP (as measured by flow rate) than zero.

I suggest placing a re-opener clause on the ABCWUA permit. If you would like to discuss this option, please let me know

Thank you
Ramona M. Montoya
PUEBLO OF ISLETA
(505) 869-7565

From: Nguyen, Tung [mailto:Nguyen.Tung@epa.gov]
Sent: Wednesday, January 10, 2018 10:22 AM
To: Montoya, Ramona
Cc: Ballay, Shawna ; Lucero, Ruben ; Larsen, Brent
Subject: RE: Update on ABCWUA permit consideration

Ms. Ramona,

I have not received your response since my previous email below. In the meantime, we are being judged by EPA HQ for how long it takes to renew/issue a permit. We are proceeding with the proposal mentioned below; if you have different opinion please contact us by end of tomorrow. I appreciate your understanding to this matter.

Thank you,

Tung Nguyen
Permitting Section (6WQ-PP), Water Division

U.S. EPA, Region 6
1445 Ross Ave.
Dallas, TX 75202
Ph: 214-665-7153
Fax: 214-665-2191

From: Nguyen, Tung
Sent: Tuesday, November 28, 2017 1:18 PM
To: 'Montoya, Ramona' <POI36871@isletapueblo.com>
Cc: POI17501@isletapueblo.com; poi36873@isletapueblo.com; Larsen, Brent <Larsen.Brent@epa.gov>
Subject: RE: Update on ABCWUA permit consideration

Ms. Ramona,

We have been proposing the lowest flow rate over the last 20 years for the permit renewal. I do not have supporting document/information to continue the zero (0) flow rate, which was used in the previous permit. Do you concur with our proposal? If not, please provide us information that the zero flow rate is possible right upstream from the WWTP. Please response, we are available for discussion.

Thank you,

Tung Nguyen
Permitting Section (6WQ-PP), Water Division
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From: Montoya, Ramona [<mailto:POI36871@isletapueblo.com>]
Sent: Tuesday, November 21, 2017 6:19 PM
To: Larsen, Brent <Larsen.Brent@epa.gov>; Nguyen, Tung <Nguyen.Tung@epa.gov>
Cc: POI17501@isletapueblo.com; poi36873@isletapueblo.com
Subject: Update on ABCWUA permit consideration

Good evening Brent and Tung

Prior to the Pueblo's triennial review, which we hope to conduct in 2018, Environment Division staff will be giving careful consideration to EPA's updated criteria recommendations including implementation of numeric criteria through critical low flow values.

Until updates to the Pueblo's water quality standards are submitted and approved by EPA, the ABCWUA NPDES permit should be written to comply with the Pueblo's existing WQS. The three of us had been discussing SECTION I. H "Criteria specific to a designated use shall be protected at all times and at all flow rates."

I hope our discussion will continue

I will be on leave until Monday, Nov 27. If either of you will be at the RTOC meeting in Catoosa, I'll see you there

Best regards
Ramona M. Montoya
PUEBLO OF ISLETA
(505) 869-7565